

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

IN RE: WORLD TRADE CENTER LOWER MANHATTAN  
DISASTER SITE LITIGATION

21 MC 102 (AKH)

-----X  
JANINA FRELAS,

Plaintiff,

-against-

233 BROADWAY OWNERS, LLC, et al.,

07 CV 01612

Defendants.

-----X  
NOTICE OF  
ADOPTION OF  
ANSWER TO  
MASTER  
COMPLAINT

PLEASE TAKE NOTICE THAT defendant 233 Broadway Owners, LLC, as and for its responses to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-referenced action, hereby adopt its Answer to Master Complaint, dated August 1, 2007, which was filed in the matter of In re World Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH).

To the extent that defendant's Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Check-Off Complaint in the above captioned matter, defendant denies knowledge or information sufficient to form a belief as to the truth of such specific allegations.

PLEASE TAKE FURTHER NOTICE, that defendant 233 Broadway Owners, LLC reserves the right to serve a reply to cross-claim and/or interpose a cross-claim against any and all co-defendants.

WHEREFORE, defendant 233 Broadway Owners, LLC demands judgment dismissing the above-captioned action as against it together with its costs and disbursements.

Dated: September 12, 2007  
Melville, New York

YOURS, etc.,

  
MARGARET HERRMANN (MH3676)  
LAWRENCE, WORDEN, RAINIS & BARD, P.C.  
Attorneys for Defendant 233 BROADWAY  
OWNERS, LLC  
425 Broad Hollow Road, Suite 120  
Melville NY 11747  
(631) 694-0033

TO: WORBY GONER EDELMAN & NAPOLI BERN, LLP  
Attorneys for Plaintiff  
115 Broadway, 12<sup>th</sup> Fl.  
New York NY 10006  
(212) 267-3700

DEFENSE COUNSEL SERVED ELECTRONICALLY

**VERIFICATION OF MAILING**

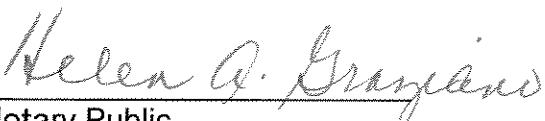
HEATHER E. ROSS, being duly sworn, deposes and says: I am over 21 years of age, not a party to the within action, and reside at Huntington, New York. On September 14, 2007, I served the annexed NOTICE OF ADOPTION OF ANSWER TO MASTER COMPLAINT upon the following named attorneys representing the following named respective parties of this action:

Hon. Alvin K. Hellerstein, U.S. District Judge  
U.S. District Court, Southern District of NY  
United States Courthouse  
500 Pearl Street, Room 1050  
New York NY 10007  
**COURTESY COPY**

that being the address so designated by said attorneys for that purpose, by depositing a true copy of same enclosed in a post paid, properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York.

  
\_\_\_\_\_  
HEATHER E. ROSS

Sworn to before me this  
14<sup>th</sup> day of September, 2007

  
\_\_\_\_\_  
Notary Public

HELEN A. GRAZIANO  
Notary Public, State of New York  
No. 01GR6027527  
Qualified in Nassau County  
Commission Expires July 6, 20 11

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Attorneys for Plaintiff  
115 Broadway, 12<sup>th</sup> Fl.  
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